

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRAVE BULK TRANSPORT LTD.,

07 Civ. 4546 (CM)

Plaintiff,

NOTICE OF MOTION

-against-

SPOT ON SHIPPING LTD., a.k.a. SPOT
ON SHIPPING LTD. BVI, a.k.a. SPOT ON,
a.k.a. CLAYTON STAR COMPANY LIMITED
a.k.a. CLAYTON STAR and PHEW ASSET
MANAGEMENT LIMITED a.k.a. PEHW ASSET
MANAGEMENT LTD. and ZHANGGANG SHIPPING
LIMITED,

Defendant.

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PLEASE TAKE NOTICE, that upon the annexed Declaration, and
Memorandum of Law and all the prior pleadings and proceedings in
this action, defendant ZHANGGANG SHIPPING LIMITED (ZSL), will move
the Court before the Honorable Colleen McMahon at the Courthouse
located at 500 Pearl Street, New York, New York, for an order,
pursuant to Rule 12 of the Federal Rules of Civil Procedure,
dismissing plaintiff's complaint, and thus vacating the Court's
order of attachment, and granting to ZSL such other and further
relief as this Honorable Court may deem just and proper.

Dated: New York, New York
March 4, 2008

MAHONEY & KEANE, LLP
Attorneys for Defendant
ZHANGGANG SHIPPING LIMITED

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